

***IN THE DISTRICT COURT OF THE UNITED STATES***  
***for the Western District of New York***

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**October 2019 GRAND JURY**  
**(Impaneled 10/11/2019)**

**THE UNITED STATES OF AMERICA**

**v.**

**JARED MARC BROWN**

**SUPERSEDING INDICTMENT**  
**19-CR-95**

**Violations:**

Title 18, United States Code,  
Sections 115(a)(1)(A), 115(a)(1)(B),  
871(a) and 876(c)

(7 Counts)

**COUNT 1**

**(Threat to the President)**

**The Grand Jury Charges That:**

On or about March 25, 2019, in the Western District of New York, and elsewhere, the defendant, **JARED MARC BROWN**, did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon, the President of the United States, specifically, the defendant sent a letter to United States Secret Service Special Agent Vincent Merlino, in which the defendant wrote, "I'm [ ] gonna kill Donald Trump with Anthrax when I get out."

**All in violation of Title 18, United States Code, Section 871(a).**

**COUNT 2**

**(Retaliating Against a United States Judge)**

**The Grand Jury Further Charges That:**

On or about March 25, 2019, in the Western District of New York, and elsewhere, the defendant, **JARED MARC BROWN**, did threaten to assault and murder United States

District Judge Lawrence J. Vilardo, with intent to retaliate against Judge Vilardo on account of the performance of his official duties.

**All in violation of Title 18, United States Code, Section 115(a)(1)(B).**

**COUNT 3**

**(Retaliating Against a United States Judge's Immediate Family)**

**The Grand Jury Further Charges That:**

On or about March 25, 2019, in the Western District of New York, and elsewhere, the defendant, **JARED MARC BROWN**, did threaten to assault and murder a member of the immediate family of United States District Judge Lawrence J. Vilardo, that is, Judge Vilardo's spouse, with intent to retaliate against Judge Vilardo on account of the performance of his official duties.

**All in violation of Title 18, United States Code, Section 115(a)(1)(A).**

**COUNT 4**

**(Retaliating Against a Federal Law Enforcement Officer)**

**The Grand Jury Further Charges That:**

On or about March 25, 2019, in the Western District of New York, and elsewhere, the defendant, **JARED MARC BROWN**, did threaten to assault and murder United States Secret Service Special Agent Vincent Merlino, a Federal law enforcement officer, with intent to retaliate against Special Agent Merlino on account of the performance of his official duties.

**All in violation of Title 18, United States Code, Section 115(a)(1)(B).**

**COUNT 5**  
**(Mailing Threatening Communication)**

**The Grand Jury Further Charges That:**

On or about March 25, 2019, in the Western District of New York, and elsewhere, the defendant, **JARED MARC BROWN**, did knowingly and willfully cause to be delivered by the United States Postal Service according to the direction thereon, a communication, postmarked March 20, 2019, addressed to United States Secret Service Special Agent Vincent Merlino, a Federal law enforcement officer, and containing a threat to injure the President of the United States, United States District Judge Lawrence J. Vilardo, Judge Vilardo's spouse, and Special Agent Vincent Merlino.

**All in violation of Title 18, United States Code, Section 876(c).**

**COUNT 6**  
**(Mailing Threatening Communication)**

**The Grand Jury Further Charges That:**

On or about July 11, 2019, in the Western District of New York, and elsewhere, the defendant, **JARED MARC BROWN**, did knowingly cause to be delivered by the United States Postal Service according to the direction thereon, a communication, postmarked July 9, 2019, addressed to United States Secret Service Special Agent Vincent Merlino, a Federal law enforcement officer, and containing a threat to injure the President of the United States, United States District Judge Lawrence J. Vilardo, and Special Agent Vincent Merlino.

**All in violation of Title 18, United States Code, Section 876(c).**

**COUNT 7**  
**(Mailing Threatening Communication)**

**The Grand Jury Further Charges That:**

On or about November 1, 2019, in the Western District of New York, and elsewhere, the defendant, **JARED MARC BROWN**, did knowingly cause to be delivered by the United States Postal Service according to the direction thereon, a communication, postmarked October 30, 2019, addressed to United States District Judge Lawrence J. Vilaro, a United States judge, and containing a threat to injure Judge Vilaro, United States Secret Service Special Agents Vincent Merlino and Roberta Kane, and others.

**All in violation of Title 18, United States Code, Section 876(c).**

DATED: Rochester, New York, December 19, 2019.

JAMES P. KENNEDY, JR.  
United States Attorney

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A TRUE BILL:

s/Foreperson  
FOREPERSON